

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

SHANDLE MARIE RILEY,

Plaintiff,

~v~

HAMILTON COUNTY GOVERNMENT,

DANIEL WILKEY,
individually and in his capacity as deputy sheriff
for Hamilton County Government, and

JACOB GOFORTH,
individually and in his capacity as deputy sheriff
for Hamilton County Government,

Defendants.

§

§ **Case No. 1:19-cv-304**

§ Judge Travis R. McDonough

§ Magistrate Judge Christopher H. Steger

§

JURY DEMANDED

§

Consolidated

§

1:19-cv-198

§

1:19-cv-305

§

1:19-cv-329

§

1:19-cv-348

§

1:20-cv-16

§

1:20-cv-17

§

1:20-cv-19

§

1:20-cv-20

§

1:19-cv-44

§

§

MOTION TO WITHDRAW-KELSEY WILSON

Movants, counsel for Plaintiff, pursuant to Tenn. Sup. Ct. R., Rule 8, RPC 1.16(a) and (b), and E.D.TN. LR 83.4, move this Court for permission to withdraw as counsel of record for Plaintiff Kelsey Wilson.

Introduction:

Tenn. Sup. Ct. R., Rule 8, RPC 1.6(b)(5), allow Movants to disclose certain amounts of information relating to the representation to establish a claim on behalf of Movants.

Basis for Motion:

Movants' continued representation of Plaintiff will result in a violation of the Rules of Professional Conduct. See Tenn. Sup. Ct. R., Rule 8, RPC 1.16(a)(1). The rule that will be violated is RPC 1.4 (communication). Additionally, the Plaintiff has terminated the representations of the Movants in this matter. See Tenn. Sup. Ct. R., Rule 8, RPC 1.16(a)(3).

Finally, the Plaintiff has rendered the representation unreasonably difficult. See Tenn. Sup. Ct. R., Rule 8, RPC 1.16(b)(6).

Prerequisites to Motion:

Movants certify to the Court that they delivered a notice of Movants' intent to file this motion to withdraw more than 14 days from the date Movants filed this instant motion, and that the Plaintiff has a right to appear at the hearing of the motion.

No hearing date on the motion is set at this time; however, Movants shall serve the Plaintiff at least seven (7) days before the hearing (excluding Saturdays, Sundays and holidays) with notice (1) of the date, time and place of the hearing, and (2) that the Plaintiff has a right to appear and be heard on the motion once Movants obtain a hearing date from the Clerk of Court and this Court.

The Plaintiff's last known contact information is as follows:

2100 Wisteria Drive, Hixson, TN 37343

Email: kelseylorenw@gmail.com

(423) 619-9680

Wherefore, Movants move this Court to set this motion for a hearing and grant leave to Movants to withdraw as Counsel for the Plaintiff.

Respectfully submitted,

By: /s/ Robin Ruben Flores

ROBIN RUBEN FLORES

TENN. BPR #20751

GA. STATE BAR #200745

Counsel for Plaintiff and Movant

4110-A Brainerd Road

Chattanooga, TN 37411

423 / 267-1575 fax 267-2703

robin@robinfloreslaw.com

additional signatures and certificate of service on next page

THE COCHRAN FIRM MID-SOUTH

/s/ Howard B. Manis (by permission)

HOWARD B. MANIS

TENN. BPR #16202

40 South Main Suite 1700

Memphis, TN 38103

(901) 523-1222

Attorney for the Plaintiff

hmanis@cochranfirmidsouth.com

THE COCHRAN FIRM MID-SOUTH

/s/ Andrew C. Clarke (by permission)

ANDREW C. CLARKE

TENN. BPR # 15409

40 South Main Suite 1700

Memphis, TN 38103

(901) 523-1222

Attorney for the Plaintiff

acclarke@cochranfirmidsouth.com

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following named persons with a true and exact copy of this motion to withdraw by placing a true and exact copy of said motion in the United States Mail, addressed to PLAINTIFF at her last known addresses,

2100 Wisteria Drive, Hixson, TN 37343

Email: kelseylorenw@gmail.com

I also certify that I have delivered a copy of this motion to all persons noted on the electronic filing receipt.

DATE: February 4, 2021

BY: /s/ Robin Ruben Flores